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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**(San Jose Division)**

LYFT, INC.,

Plaintiff,

v.

AGIS SOFTWARE DEVELOPMENT LLC,

Defendant.

Case No. 5:21-cv-04653-BLF

**JOINT STIPULATED [PROPOSED]  
SCHEDULING ORDER**

Dept: Courtroom 3 – 5th Floor  
Judge: The Honorable Beth Labson Freeman

Trial date: October 16, 2023

Plaintiff Lyft, Inc. (“Lyft”) and Defendant AGIS Software Development, LLC (“AGIS”) submit this Stipulation and Proposed Order to set the following deadlines pursuant to Case Management Order (Dkt. 59).<sup>1</sup>

Event	DATE or DEADLINE
Initial Case Management Conference	1/27/22
Deadline to exchange initial disclosures	2/25/22
Infringement Contentions & Accompanying Documents (Patent L.R. 3-1, 3-2)	2/25/22
Last Day to Request Leave to Amend Pleadings per F.R.Civ.P. 15	3/28/22
Exchange of Proposed Claim Terms (Patent L.R. 4-1)	4/8/22
Invalidity Contentions & Accompanying Documents (Patent L.R. 3-3, 3-4)	4/11/22
Meet and Confer to Limit Claim Terms to 10 Terms Likely to be Most Significant to the Dispute (Patent L.R. 4-1(b))	4/15/22
Exchange of Preliminary Claim Constructions (Patent L.R. 4-2)	4/29/22
Damages Contentions (Patent L.R. 3-8)	5/31/22
Parties Meet and Confer to Narrow Issues and Prepare Joint Claim Construction and Prehearing Statement (Patent 3L.R. 4-2(c))	6/3/22
Joint Claim Construction Statement Due (Patent L.R. 4-3)	6/10/22
Responsive Damages Contentions (Patent L.R. 3-9)	6/30/22
Completion of Claim Construction Discovery (Patent L.R. 4-4)	7/11/22
AGIS’s Opening Claim Construction Brief Due (Patent L.R. 4-5)	7/25/22
Defendants’ Responsive Claim Construction Brief Due (Patent L.R. 4-5)	8/8/22
AGIS’s Reply Claim Construction Brief Due (Patent L.R. 4-5)	8/15/22
Further Case Management Conference	8/18/22 at 1:30 PM
Claims Tutorial	8/18/22 at 1:30 PM
Claim Construction Hearing (Patent L.R. 4-6)	9/1/22 at 1:30 PM

<sup>1</sup> The parties agree that they may seek leave to adjust the stipulated dates included herein if necessary based on the forthcoming amended complaint and pending motion to dismiss.

<b>Event</b>	<b>DATE or DEADLINE</b>
Advice of Counsel (Patent L.R. 3-7)	10/3/22
Close of Fact Discovery	1/12/23
Simultaneous Opening Expert Reports by the parties on issues where they bear the burden of proof	2/2/23
Simultaneous Rebuttal Expert Reports	3/2/23
Close of Expert Discovery	3/16/23
Final Day for Filing Dispositive Motions	4/6/23
Oppositions to Dispositive Motions	4/27/23
Replies to Dispositive Motions	5/11/23
Hearing for Dispositive Motions	5/25/23 at 9:00 AM
Pretrial Conference	9/14/23 at 1:30 PM
Trial Date	10/16/23 at 9:00 AM

Dated: February 11, 2022

Respectfully submitted,

**BAKER BOTTS L.L.P.**

/s/ Jeremy J. Taylor

/s/ Vincent J. Rubino, III

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**FILER'S ATTESTATION**

I, Jeremy J. Taylor, am the ECF user whose ID and password are being used to file this Joint Case Management Conference Statement. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing.

Date: February 11, 2022

/s/ Jeremy J. Taylor  
Jeremy J. Taylor

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

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BETH LABSON FREEMAN  
United States District Judge